

UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

**FINAL FEE APPLICATION COVER SHEET FOR THE
PERIOD APRIL 4, 2023 THROUGH AUGUST 11, 2023**

Debtor: LTL Management LLC Applicant: Molo Lamken LLP
Case No.: 23-12825 (MBK) Client: Official Comm. of Talc
Chapter: 11 Case Filed: April 4, 2023
Claimants

**SECTION I
FEE SUMMARY**

☐ Monthly Fee Application No. __ or ☐ Interim Fee Application No. __ or ☒ Final Fee Application

Summary of Amounts Requested for the Period from April 4, 2023 through August 11, 2023

Holdback for April 2023 Invoice: \$37,802.50
Holdback for May 2023 Invoice: \$20,326.20
Holdback for June 2023 Invoice: \$20,346.00
Holdback for July 1-August 11, 2023 Invoice: \$48,723.70
Total Holdback Fees Due: \$127,198.40
Outstanding Non-Holdback Fees: \$352,902.30
Outstanding Disbursements: \$14,700.26
Total Amount Paid To Date: \$162,688.80
Total Outstanding Balance Sought To Be Paid at this Time: \$494,800.96

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ¹	FEE
1. Jeffrey A. Lamken	Partner 1991	101.6	\$1,750	\$177,800.00
2. Lucas Walker	Partner 2010	48.0	\$1,100	\$52,800.00
3. Rayiner I. Hashem	Partner 2015	266.6	\$975	\$259,935.00
4. Eugene Sokoloff	Counsel 2013	36.0	\$995	\$35,820.00
5. Mark Kelley	Associate 2016	1.8	\$895	\$1,611.00
6. Nathaniel Rubin	Associate 2019	122.7	\$775	\$95,092.50
7. Catherine Martinez	Associate 2020	14.9	\$775	\$11,547.50
8. Fu Shek Rocky Li	Associate 2020	1.5	\$775	\$1,162.50

¹ Rates in this statement reflect the rates disclosed in MoloLamken's Retention Application [Dkt. 542].

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ¹	FEE
9. Aidan Antonienko	Paralegal	0.3	\$295	\$88.50
10. Adam Collins	Paralegal	1.5	\$295	\$442.50
11. Charlie Christoffersen	Paralegal	6.0	\$295	\$1,770.00
12. Julia Downing	Paralegal	2.0	\$295	\$590.00
13. Natalie Fay	Paralegal	1.0	\$295	\$295.00
14. Anna Starobinets	Paralegal	13.0	\$295	\$3,835.00
TOTALS		616.9		\$642,789.50

Fee Totals: \$642,789.50

Disbursements Totals: \$14,700.26

Total Fee Application: \$657,489.76

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	39.6	\$32,849.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	577.3	\$609,939.70
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
SERVICE TOTALS:	616.9	\$642,789.50

SECTION III
SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. Court-Solutions	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including printing & scanning services. This includes trial preparation.	\$14,688.26
h) Other Research Title searches, UCC searches, Asset searches, Accurant.	\$12.00
i) Court Reporting Transcripts.	\$0.00
j) Travel Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) Courier & Express Carriers Overnight and personal delivery.	\$0.00
l) Postage	\$0.00
m) Other (specify) Professional Services BRI LLC In-House Investigative Services.	\$0.00
n) Other (specify) Trial Expenses	\$0.00
o) Other (specify) Professional Services	\$0.00
p) Other (specify) Deposition Services Paszkievich Court Reporting	\$0.00
q) Other (specify) Meals	\$0.00
r) Other (specify) eDiscovery Hosting In-House eDiscovery platform.	\$0.00
DISBURSEMENTS TOTAL:	\$14,700.26

I certify under penalty of perjury that the above is true.

Date: September 8, 2023

/s/ Jeffrey A. Lamken

MoloLamken LLP (“MoloLamken”) submits this Final Fee Statement of MoloLamken LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Appellate Litigation Counsel for The Official Committee of Talc Claimants for the Period from April 4, 2023 through August 11, 2023 (“Final Monthly Fee Statement”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”), and the Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect To Requests for Compensation; And (III) Granting Related Relief [Docket No. 1211] (the “Dismissal Order”).² New invoice summaries and time entries are attached as “Exhibit A” and the time entries broken out by task are attached as “Exhibit B.”³ MoloLamken may seek additional fees for service related to appeals, pursuant to the Dismissal Order.

WHEREFORE, MoloLamken respectfully requests payment of fees and expenses for the Fourth Monthly Fee Statement in the sum of \$668,249.76, in accordance with the terms of the Interim Compensation Order.

Dated: September 8, 2023

MOLOLAMKEN LLP

Special Appellate Litigation Counsel to the Official Committee of Talc Claimants

By: /s/ Jeffrey A. Lamken
Jeffrey A. Lamken

² The final fee application includes time and expenses for the period between April 4 and April 14, 2023, as a motion is pending before the court to make the effective date of TCC professionals April 4, 2023, or to allow the fees and expenses for such period as a substantial contribution to this bankruptcy case.

³ B160 corresponds to time spent preparing fee and employment applications. L240, L430, L500, L510, and L520 correspond to time spent on litigation relating to the Committee’s motion to dismiss the Debtor’s petition, to time spent on litigation relating to appellate issues relating to the Committee’s motion to dismiss the Debtor’s petition, and to time spent on litigation relating to the Committee’s mandamus petition before the United States Court of Appeals for the Third Circuit.